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IN THE UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

(Medford Division)

**JEFF BOARDMAN, DENNIS RANKIN,
ROBERT SEITZ, TODD L. WHALEY,
LLOYD D. WHALEY, SOUTH BAY
WILD, INC., MISS SARAH, LLC, and MY
FISHERIES, INC.,**

Plaintiffs,

v.

**PACIFIC SEAFOOD GROUP, OCEAN
GOLD HOLDING CO., INC., DULCICH,
INC., FRANK DULCICH, PACIFIC
SEAFOOD GROUP ACQUISITION
COMPANY, INC., PACIFIC SEAFOOD
WASHINGTON ACQUISITION CO.,
INC., BANDON PACIFIC, INC., BIO-
OREGON PROTEIN, INC., PACIFIC
CHOICE SEAFOOD COMPANY,
PACIFIC COAST SEAFOODS
COMPANY, PACIFIC GARIBALDI, INC.,
PACIFIC GOLD SEAFOOD COMPANY,
PACIFIC PRIDE SEA FOOD COMPANY,
PACIFIC SEA FOOD CO., PACIFIC
SURIMI CO., INC., PACIFIC TUNA
COMPANY, LLC, WASHINGTON CRAB
PRODUCERS, INC., PACIFIC ALASKA**

Case No.: 1:15-cv-00108-MC

**PLAINTIFFS' RESPONSE TO PACIFIC
SEAFOOD'S MOTION TO COMPEL
PRODUCTION OF DOCUMENTS**

SHELLFISH, INC., SEA LEVEL
SEAFOODS, LLC, ISLAND FISH CO.,
LLC, PACIFIC RESURRECTION BAY,
PACIFIC CONQUEST, INC.,
CALAMARI, LLC, JO MARIE LLC,
LESLIE LEE, LLC, MISS PACIFIC, LLC,
PACIFIC FUTURE, LLC, PACIFIC
GRUMPY J, LLC, PACIFIC HOOKER,
LLC, PACIFIC HORIZON, LLC,
PACIFIC KNIGHT, LLC, PRIVATEER
LLC, SEA PRINCESS, LLC, TRIPLE
STAR, LLC, PACIFIC FISHING, LLC,
PACIFIC SEA FOOD OF ARIZONA,
INC., STARFISH INVESTMENTS, INC.,
DULCICH SURIMI, LLC, BIO-OREGON
PROPERTIES, LLC, PACIFIC GROUP
TRANSPORT CO., PACIFIC
MARKETING GROUP, INC., PACIFIC
RUSSIA, INC., PACIFIC RUSSIA
VENTURES, LLC, PACIFIC TUNA
HOLDING COMPANY, INC., POWELL
STREET MARKET LLC, PACIFIC
FRESH SEA FOOD COMPANY,
SEACLIFF SEAFOODS, INC., COPPER
RIVER RESOURCE HOLDING CO.,
INC., PACIFIC COPPER RIVER
ACQUISITION CO., INC., SEA LEVEL
SEAFOODS ACQUISITION, INC.,
ISLAND COHO, LLC, S & S SEAFOOD
CO., INC., PACIFIC SEAFOOD DISC,
INC., DULCICH REALTY, LLC,
DULCICH REALTY ACQUISITION,
LLC, DULCICH JET, LLC, and OCEAN
COMPANIES HOLDING CO., LLC,

Defendants.

On August 3, 2017, plaintiffs served Plaintiffs' Supplemental Response to Defendants' First Request for Production of Documents, providing supplemental responses to requests Nos. 15, 16, 18-24, 27 and 30-31. Attached as Exhibit A is a copy of that pleading.

With the exception of request Nos. 15 and 16, plaintiffs have fully responded to defendants' document request. As to request Nos. 15 and 16, the parties have agreed that all responsive documents must be produced to defense counsel no later than August 21, 2017. In addition, plaintiffs have voluntarily agreed to produce documents in three other categories during an agreed upon timeframe, also by August 21, 2017, rather than require defendants to move for reconsideration of this Court's sustaining of plaintiffs' objections to producing documents in these categories in its ruling of May 26, 2017 (Dkt. No. 132).

In light of the above action by plaintiffs and the agreement between the parties as to two outstanding categories of documents covered by Defendants' Motion to Compel, the motion to compel is moot.

DATED this 3rd day of August, 2017.

HAGLUND KELLEY LLP

By: /s/ Michael E. Haglund
Michael E. Haglund, OSB No. 772030
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of August, 2017, I served the foregoing

PLAINTIFFS' RESPONSE TO PACIFIC SEAFOOD'S MOTION TO COMPEL

PRODUCTION OF DOCUMENTS, the following by the following indicated method(s):

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by the following indicated method(s):

- ☐ by regular **mail** in a sealed first-class postage prepaid envelope and deposited with the United States Post Office at Portland, Oregon.
- ☒ by **email**.
- ☐ by **hand delivery**.
- ☐ by **overnight mail**.
- ☐ by **facsimile** as indicated.
- ☒ by transmitting full through the court's Cm/ECF system.

/s/ Michael E. Haglund

Michael E. Haglund
Eric J. Brickenstein
Attorney for Plaintiffs